to increase over the new term of lease (10 years), the emissions will remain at least at the current level.

2.) Renewal of the lease would maintain the wharf unloading facility and it's associated vapor control equipment. If the lease were not renewed, the loading operations at the wharf would cease, but could still continue at some greatly reduced level at the upland facility.

3.) The renewal of the lease will not impact any air movement as there are no large scale structures on the existing lease or planned for the course of the renewed lease.

Discussion: The proposed project is within the San Francisco Bay Area Air Basin, which consists of the counties of Santa Clara, San Mateo, San Francisco, Marin, Napa, Contra Costa and Alameda, along with portions of Solano and Sonoma.

The climate in the project area is considered Mediterranean, with cool, dry summers and mild, wet winters. Weather patterns in the region are dominated by the position of a persistent high pressure area known as the Eastern Pacific High. This feature attains its greatest strength and most northerly position during the summer when it is centered west of northern California. In this position, the High protects California from the impacts of polar systems from the North Pacific. It also allows a persistent low level temperature inversion to form, trapping pollutants below the inversion, usually at an altitude of 1,000 to 3,000 feet above sea level (US Army Corps of Engineers, 1998). Marine air trapped below the inversion will often form fog or low stratus layers during the evening hours which burn off during the day.

In Winter, when the high pressure system in the Pacific weakens, high westerly winds aloft allow storms to move inland across northern California (Chambers, 1994). With the formation of a persistent high pressure system over the mountains of northeast California, winter winds in the region are from the east and northeast (Chambers, 1994)

The Marine Terminal is within the jurisdiction of the Bay Area Air Quality Management District (BAAQMD). Ambient air quality standards are levels of ambient pollutant concentrations that, when exceeded, may adversely impact the health and welfare of the public (Chambers, 1994). At the federal level National Ambient Air Quality Standards (NAAQS) were first established as a result of the Federal Clean Air Act of 1970. These standards can be equaled continuously and exceeded once per year, and have been established for ozone (O_3), carbon monoxide (CO), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), suspended particulate matter (PM_{10}) and lead (Pb). California Ambient Air Quality Standards (CAAQS) were established in 1969 and may be different than the NAAQS). In addition to the pollutants tracked by the NAAQS, the State has established CAAQS for visibility reducing particles, sulfates, hydrogen sulfide (H_2S) and vinyl chloride. The CAAQS for ozone, carbon monoxide, nitrogen dioxide, sulfur dioxide and suspended particulate matter are not to be exceeded, while the remaining standards can not be equaled or exceeded (Chambers, 1994).

Standards for acceptable levels of various pollutants are established both at the Federal level and the State level. EPA sets the National Air Quality Standards (NAAQS), while the California Air Resources Board establishes the State levels (CAAQS). These standards are shown in Attachment 5A to this document. At the present time, the region is in attainment at the national level for NO_2, O_3 and SO_2, in nonattainment for CO and unclassified for PM_{10}. At the State level, the area is in nonattainment for O_3 and PM_{10}. The pollutant levels measured at stations in the area for the years 1993-95 are shown as Attachment 5B.

As a part of the 1994 Marine Terminal expansion Wickland installed a Vapor Control System as a mitigation for ongoing emissions. This system included burners on the upland facility, and pipelines that collect vapors